REMARKS

Claim 1 stands rejected under 35 USC §112, as being indefinite. Claims 1-21 stand rejected under 35 USC §102(b), as being anticipated by Rosenberg publication "Dbug".

Claim 1 has been amended to more clearly state the invention.

Reconsideration and withdrawal of the rejection of claim 1, as amended, under 35 USC §112, as being indefinite is respectfully requested.

Reconsideration and allowance of each of the claims 1-21, as amended, is respectfully requested.

In response to the Examiner's question of how the added limitations, such as to claim 1, are not inherent, claim 1 as previously amended is set forth below.

(currently amended) Apparatus for implementing enhanced graphical user interface functions in a graphical debugger in a computer system, said graphical debugger for identifying errors in a program under debug, said graphical debugger including instructions stored on a computer readable storage medium, said instructions when executed by the computer system to cause the computer system implement functions comprising:

| 1. (currently amended) | Apparatus for implementing enhanced graphical user interface functions in a graphical debugger in a computer system, said graphical user interface functions in a graphical debugger in a computer system, said graphical user interface functions in a graphical debugger in a computer system, said graphical user interface functions in a graphical debugger in a computer system, said graphical user interface functions in a graphical debugger in a computer system, said graphical debugger including instructions stored on a computer readable storage medium, said instructions when executed by the computer system to cause the computer system implement functions comprising:

a user interface for operatively controlling a graphical user interface;

a loadmap display manager coupled to said user interface for implementing a loadmap function; said loadmap display manager generating a list of program objects being bound to the program under debug at runtime;

said user interface responsive to said loadmap display manager, for displaying a

program loadmap <u>including said generated list of program objects being bound to the</u> program under debug at runtime;

a custom record display manager coupled to said user interface receiving user inputs and implementing a custom record display function; <u>and</u>

said user interface responsive to said custom record display manager, for displaying user selected customized records.

Independent claim 1 has been amended to more clearly define the invention as set forth above, and in the present amendment to correct the preamble. The features of the present invention as recited in claim 1 including a loadmap display manager coupled to said user interface implementing a loadmap function; said loadmap display manager generating a list of program objects being bound to the program under debug at runtime, are not implemented in prior art debuggers, such as the cited Dbug relied upon for the rejection of all the pending claims 1-21. The features of the present invention as recited in claim 1 including said user interface responsive to said loadmap display manager, displaying a program loadmap including said generated list of program objects being bound to the program under debug at runtime, are not implemented in prior art debuggers, such as the cited Dbug.

Only by the present invention are these features taught and these features are not implemented or available in known conventional debugger programs.

Applicants respectfully submit that the recited features are not inherent in a prior art debugger programs, such as Dbug. These features are not described or available in any known prior art debuggers, and thus are not inherent in prior art debuggers. The

Dbug reference is nonenabling of the subject matter of the invention, for example, the above limitations as recited in independent claim 1. The claims 1-21 are in fact directed to novel subject matter. Applicants respectfully submit that a description of the claimed invention is not found in the Dbug reference.

Anticipation is a question of fact. In re King, 801 F.2d 1324, 231 USPQ 136 (Fed. Cir. 1986). The inquiry as to whether a reference anticipates a claim must focus on what subject matter is encompassed by the claim and what subject matter is described by the reference. As set forth by the court in Kalman v. Kimberly-Clark Corp., 713 F.2d 760, 218 USPQ 781, 789 (Fed. Cir. 1983), cert. denied, 465 U.S. 1026 (1984), it is only necessary for the claims to "read on' something disclosed in the reference, i.e., all limitations in the claim are found in the reference, or 'fully met' by it." The cited Dbug reference fails to suggest or describe the claimed elements with sufficient specificity to establish anticipation under 35 USC §102(b).

As described in the specification at pages 1 and 2, the present invention solves problems with the use of conventional debugger programs where some programs dynamically load program objects and object archives at run time. The disclosed debuggers of Dbug, like other conventional debuggers, display a flat list of source files that are in the program being debugged. Although this is very useful, sometimes the programmer needs additional data that cannot be displayed with known debuggers. For programs that dynamically bind to program objects, the information about these objects is stored in a loadmap. Today the only other way to discern this information would be to examine make files, or to dump the debug data of the individual

object files or archives with an external dumping tool. The present invention provides an improved debugger having a loadmap display manager that when debugging such programs enables display for the programmer of what objects are in each part of the loadmap and the source files that correlate to these objects. Thus, Applicants respectfully submit that the subject matter of the claimed invention is novel, and nonobylous.

For a claim of a patent to be "anticipated" each and every element of that claim must be disclosed in a single prior art reference. Lack of novelty can be established only where a prior invention is identical to (or "anticipates") the invention sought to be patented. "In addition, the prior art reference must be enabling, thus placing the allegedly disclosed matter in the possession of the public." Akzo N.V. v. U.S. Intern. Trade Com'n, 808 F.2d 1471, 1479 (Fed. Cir. 1986). The elements found in the prior art reference must be arranged as in the claim. Connell v. Sears, Roebuck & Co., 722 F.2d 1542, 1548 (Fed. Cir. 1983).

Each of the independent claims 1, 8, 14, and 17, as presented, is patentable of the references of record including the Dbug publication. As presented, the steps of generating and the program loadmap is further defined to include a list of program objects being bound to the program under debug at runtime and the steps of displaying the program loadmap includes displaying a program loadmap including said generated list of program objects being bound to the program under debug at runtime.

These features of the invention are only taught by applicants. Dbug does not enable.

nor provide any suggestion of such debugger features as taught and claimed by applicants, as recited in each of the independent claims 1, 8, 14, and 17, as presented.

Dbug does not teach or suggest a debugger function or step of generating a list of program objects being bound to the program under debug at runtime. The disclosed debugger for Java applications is not equivalent to and does not achieve the subject matter of the debugger features as taught and claimed by applicants, as recited in each of the independent claims 1, 8, 14, and 17, as presented. Dbug does not teach or suggest the steps of displaying the program loadmap that includes said generated list of program objects being bound to the program under debug at runtime, as recited in each of the independent claims 1, 8, 14, and 17, as amended.

Anticipation is established only when a single prior art reference discloses, expressly or under principles of inherency, each and every element of a claimed invention. Leinoff v. Louis Milona & Sons, Inc., 726 F.2d 734, 220 U.S.P.Q. 845 (Fed. Cir. 1984). Dbug does not disclose each and every element of claim 1, and Dbug does not enable the elements of claim 1 and fails to place the subject matter of the invention, as recited in claim 1 in the possession of the public. Each of the independent claims 8, 14, and 17, as amended, is patentable for the same reasons as claim 1.

Each of the independent claims 1, 8, 14, and 17, as amended, is patentable.

Each of the dependent claims 2-7, 9-13, 15-6 and 18-21, as presented, depends from respective patentable claims 1, 8, 14, and 17, further defining the invention. Thus, each of the dependent claims 2-7, 9-13, 15-6 and 18-21 is likewise

Serial No. 10/660,034

patentable.

Applicants have reviewed all the art of record, and respectfully submit that the claimed invention is patentable over all the art of record, including the references not relied upon by the Examiner for the rejection of the pending claims.

It is believed that the present application is now in condition for allowance and allowance of each of the pending claims 1-21, as amended, is respectfully requested. Prompt and favorable reconsideration is respectfully requested.

If the Examiner upon considering this amendment should find that a telephone interview would be helpful in expediting allowance of the present application, the Examiner is respectfully urged to call the applicants' attorney at the number listed below.

Respectfully submitted.

S-signature by

___/Joan Pennington/_____ Bv: Joan Pennington

> Reg. No. 30,885 Telephone: (312) 670-0736

March 1, 2007